

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEBRASKA**

IN THE MATTER OF:) BK. NO. 20-81258-BSK
)
DAVID K BORKOWSKI) CHAPTER 13
SSN: ###-##-7103)
KIMBERLY BORKOWSKI)
SSN: ###-##-0079)
)
Debtors.)

TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN

COMES NOW, KATHLEEN A. LAUGHLIN, Chapter 13 Trustee, and objects to confirmation of the plan pursuant to 11 U.S.C. § 1324 and Neb. R. Bankr. P. 3015-2(D) for the following reason(s):

1. The Trustee has requested the debtors to furnish additional documents. Until these documents are provided and an opportunity for review has occurred, the Trustee reserves all objections to confirmation.
2. The debtors have not filed with the Court their pay advices for the 60 days prior to filing Chapter 13 as required in 11 U.S.C. §521. Until these documents are provided and an opportunity for review has occurred, the Trustee reserves all objections to confirmation.
3. Schedule A/B does not list an interest in life insurance policies. However, Schedule J includes a monthly payment for life insurance policies. Clarification is necessary.
4. The plan does not provide treatment for the secured claim filed by Wells Fargo Bank N.A. d/b/a Wells Fargo Auto.

WHEREFORE, Trustee prays that the Trustee's Objection to Confirmation be sustained.

DATED: November 16, 2020

s/ Kathleen A. Laughlin
Kathleen A. Laughlin #16883
Chapter 13 Trustee
13930 Gold Circle, Suite #201
Omaha, NE 68144
(402) 697-0437
1-800-884-0437

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the Trustee's Objection was served on CARRIE DOLL, debtors attorney, via the CM/ECF system of the United States Bankruptcy Court and a copy was mailed on November 16, 2020, by first-class, U.S. mail, postage prepaid to the Debtors at the addresses listed below:

DAVID K BORKOWSKI
28432 WAVERLY RD
MURDOCK, NE 68407

KIMBERLY BORKOWSKI
28432 WAVERLY RD
MURDOCK, NE 68407

s/ Kathleen A. Laughlin
Kathleen A. Laughlin